

SILLS CUMMIS & GROSS P.C.

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Attorneys for Plaintiff

Johnson & Johnson Health Care Systems Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JOHNSON & JOHNSON

HEALTH CARE SYSTEMS INC.,

Plaintiff,

v.

SAVE ON SP, LLC,

Defendant.

:

Civil Action No. 22-2632(JKS)(CLW)

:

Hon. Jamel K. Semper, U.S.D.J.

:

Hon. Cathy L. Waldor, U.S.M.J.

Hon. Freda L. Wolfson, Special Master

:

NOTICE OF MOTION TO SEAL

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COUNSEL:

PLEASE TAKE NOTICE that on October 7, 2024 at 9:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson & Johnson Health Care Systems Inc. (“JJHCS”), together

with counsel for defendant Save On SP, LLC (“SaveOnSP”), will apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order, to

- (a) Permanently maintain under seal the following letters and supporting exhibits filed by counsel for the parties:
 - (i) SaveOnSP’s Motion to Compel JJHCS to Produce “Best Price” Certifications, dated April 18, 2024, with related briefing on May 2 and May 9, 2024 (ECF No. 285, filed May 13, 2024);
 - (ii) SaveOnSP’s Motion to Compel JJHCS to Produce TrialCard Documents, dated April 19, 2024, with related briefing on May 7 and May 17, 2024 (ECF No. 312, filed June 12, 2024); and
 - (iii) SaveOnSP’s Motion to Compel JJHCS to Produce Documents from the Janssen Entities, dated April 22, 2024, with related briefing on May 14 and May 21, 2024 (ECF No. 313, filed June 12, 2024);
- (b) Permit JJHCS to file the proposed public versions of ECF Nos. 285, 312, and 313, attached as Exhibits A, B, & C to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and the indices in support of Motion to Seal. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

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Dated: August 27, 2024